

### SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed April 16, 2004. Claims 13, 16, 18 and 19 are amended to more clearly recite features of the claimed invention. Claims 13-21 remain pending in the application. Applicant respectfully requests reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

#### Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 13-21 under 35 U.S.C. § 103(a) as obvious in view of, and therefore unpatentable over, combinations of U.S. Patent No. 5,394,054 to Chen (“Chen”), U.S. Patent No. 5,990,610 to Matsumoto et al (“Matsumoto”), and prior art allegedly admitted by Applicant. Specifically, the Examiner rejected claims 13, 14, 16 and 19-21 as unpatentable over Chen in view of Matsumoto and rejected claims 15, 17 and 18 as unpatentable over Chen, Matsumoto, and prior art allegedly admitted by Applicant.

Applicant respectfully traverses the Examiner’s rejections. To establish a *prima facie* case of obviousness, three criteria must be met: (1) the prior art references must teach or suggest all the claim limitations; (2) some suggestion or motivation to combine the references must be found in the prior art; and (3) there must be a reasonable expectation of success. MPEP § 2143. As explained below, the Examiner has not established a *prima facie* case of obviousness.

Claim 13, as amended, recites a CRT combination including a second lens “at the interface of the focus electrode and a continuous internal conductive coating on the neck and the funnel.” Chen and Matsumoto do not, individually or jointly, disclose, teach or suggest an apparatus including this limitation. Chen teaches that the G3 grid 68 is kept at anode potential  $V_A$ , the G4 grid 70 is kept at focus potential  $V_F$ , and the G5 grid is kept at anode potential  $V_A$ . Since focusing relies on differences in potential, after the beam 73 leaves the triode, the beam is focused first between the G3 grid 68 and the G4 grid 70, and again between the G4 grid 70 and the G5 grid 72. In a previous Office Action mailed April 22, 2003, the Examiner conceded that in Chen there is indeed no focusing at the interface between the grid G5 and the conductive coating, because both are at the same anode potential. Hence, the CRT of Chen cannot be considered a combination including a second lens “at the interface of the focus electrode and a continuous internal conductive coating on the neck and the funnel.” Matsumoto discloses only a

particular way of arranging pins in a connector and makes a suggestion to try the arrangement in a CRT, but it discloses nothing related to how focusing is carried out in an einzel focusing lens, nor how electrodes and grids should be arranged therein. Thus, Chen and Matsumoto taken together cannot disclose, teach or suggest a combination including the limitations in the claim.

Regarding claims 14 and 15, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 13 is in condition for allowance. Applicant therefore respectfully submits that claims 14 and 15 are allowable by virtue of their dependence on allowable claim 13, as well as by virtue of the features recited therein. Applicant thus respectfully requests withdrawal of the rejections and allowance of these claims.

Claims 16 and 18, as amended, both recite a CRT combination including a second lens “at the interface of the focus electrode and a continuous internal conductive coating on the neck and the funnel.” As discussed above in connection with claim 13, none of the references relied upon teaches a combination including this limitation. Moreover, the references, taken alone or in combination, do not suggest this combination. For these reasons, Applicant respectfully submits that claims 16 and 18 are in condition for allowance, and requests withdrawal of the rejection and allowance of the claims.

Regarding claim 17, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 16 is in condition for allowance. Applicant therefore respectfully submits that claim 17 is allowable by virtue of its dependence on allowable claim 16, as well as by virtue of the features recited therein. Applicant therefore respectfully requests withdrawal of the rejections and allowance of this claim.

Claim 19, as amended, recites an einzel focusing lens including a second lens “at the interface of the focus electrode and a continuous internal conductive coating on the neck and the funnel.” As discussed above in connection with claim 13, none of the references relied upon by the Examiner teaches a combination including this limitation. Moreover, the references, taken alone or in combination, do not suggest this combination. For these reasons, Applicant respectfully submits that claim 19 is in condition for allowance, and requests withdrawal of the rejection and allowance of the claim.

Regarding claims 20 and 21, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 19 is in condition for allowance. Applicant therefore respectfully submits that claims 20 and 21 are allowable by virtue of their dependence on allowable claim 19, as well as by virtue of the features recited therein. Applicant thus respectfully requests withdrawal of the rejections and allowance of these claims.

#### Conclusion

Given the above amendments and accompanying remarks, Applicant believes all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

#### Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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